Product Safety Update Procedure

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ABSTRACT: This document describes the procedure used by Digital to amend product safety agency certifications.

APPLICABILITY: This document provides guidelines to all engineering groups and manufacturing locations in Digital that design, manufacture, or support a product intended to bear an external agency's monogram.

STATUS: APPROVED 26-Oct-1990; use VTX SMC for current status.

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APPROVAL: This document has been reviewed and recommended for approval by the General Review group for its category.

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1 INTRODUCTION

It is the policy of Digital Equipment Corporation to ensure all products designed, manufactured, and/or sold by Digital have been submitted to an independent external agency for review of their product safety characteristics.

The initial submittal of a product is not sufficient to allow the continued use of these agencies' monograms. Specifically, Digital and its subsidiaries worldwide have contracts with representatives of external agencies to inspect any Digital manufacturing location, unannounced, during normal business hours.

During these inspections, Digital's products are reviewed by external agency representatives. The products bearing the agency's monogram must meet the construction requirements the agency has deemed necessary to build a safe product. For Underwriters Laboratories, Inc. (UL), these requirements are detailed in the *UL Follow-Up Services Procedure*. For Canadian Standards Association (CSA), the requirements are found in either the *CSA Model Certification Report* or the Digital generated *Engineering Product Safety Report*. These documents include product safety test results depending on the type of certification granted by the CSA. For Technischer Uberwachungs-Verein (TUV) the requirements are noted on constructional data forms. Refer to *DEC STD 119-5 Process for Design, Evaluation, Testing, and Certification of Hardware Products to Product Safety Requirements*. Other external agencies may use different techniques to determine certification.

NOTE

CSA certification reports are generated by Digital Product Safety Engineering under the Category Certification Program. These reports may be updated by Digital product safety engineers.

1.1 PURPOSE

External agency inspection reports can only be amended by the issuing agency. This document describes the reasons why these agency reports may need to be amended and the process by which it is accomplished.

1.2 SCOPE

This document applies to all engineering groups and manufacturing locations in Digital that design, manufacture, or support a product intended to bear an external agency's monogram. Failure to comply with the provisions of this document may result in lost revenue due to product holds.

1.3 DEFINITIONS

agency report update: A document in which Digital requests the agency to evaluate an alternate construction of the product and/or amend the agency report.

client code number: The unique number assigned by UL to each manufacturing facility and engineering organization. Each request for UL service must be accompanied by a client code number. Refer to *Corporate Product Safety and Regulations' (CPSR) UL Billing Procedure* in the CPSR Library.

controlled component: A component described in a product safety report. Refer to the TUV Construction Data Form, *DEC STD 119 Product Safety Report*, *UL Follow-Up Procedure*, *CSA Model Certification Report*, and EL-00424-00, *Digital Product Safety Handbook*.

Corporate Product Safety and Regulations (CPSR): A group chartered by Digital to oversee the implementation of product safety and regulatory programs throughout the Corporation.

findings letter: Notification given to Digital by TUV or CSA stating that a product is noncompliant.

Plant Product Safety Coordinators (PPSC): An individual in each manufacturing location responsible for the implementation of an effective product safety program in that location.

Product Safety Engineer (PSE): Engineers chartered by Digital to consult with design engineering and others to ensure the safety of Digital's products.

support engineering: The product safety engineering group responsible for the product after Phase 4A.

Variation Notice (VN): A written report from an UL inspector informing Digital and UL that the product, as it is being manufactured, is not in compliance with the agency report. A variation notice requires immediate corrective action to avoid a product hold.

1.4 RESPONSIBILITIES

1.4.1 Engineering

The **Product Safety Engineer (PSE)** is responsible for ensuring: the initial product submittal to the agency is complete and accurate; the agency report indicates the known manufacturing locations; and any changes to the report meet the requirements of both the agency's and Digital's standards. The PSE is also responsible for submitting agency change report updates and for assisting the PPSC in accordance with this document.

The **Original Engineering Group** performs design reviews (refer to DEC STD 119-5), ensures all new products comply with external agency requirements, and in general, is responsible for the product through Phase 4A.

The **Support Engineering Group** is responsible for the product after Phase 4A. This includes, but is not limited to: physically keeping the product file current; updating UL, CSA, and TUV reports at the request of the PBUs, PSEs, and PPSCs; consulting with manufacturing plants before implementing changes; and performing and evaluating tests required to support any changes to the product.

1.4.2 Corporate Product Safety and Regulations

Corporate Product Safety and Regulations (CPSR) is responsible for maintaining this document and providing corporate-wide access to product files and product information.

1.4.3 Manufacturing

The **Area Manufacturing Product Safety and Regulations Managers** are responsible for managing standards and regulation compliance programs, and assisting manufacturing plants within the scope of this document.

The **Plant Manager** has the responsibility for ensuring shipment of products are compliant with all internal and external standards and regulations.

The **Plant Product Safety Coordinator (PPSC)** is responsible for:

- Ensuring that the proper procedures are in place in their plant to maintain product compliance with the agency's report
- Maintaining all applicable agency documentation required for the plant
- Interfacing with responsible engineering groups
- Accompanying the agency inspector during plant audits
- Driving any corrective action required as the result of an audit
- Submitting agency report updates in accordance with this document
- Paying all applicable agency invoices in a timely manner per area procedures

2 REASONS FOR AGENCY REPORT UPDATES

2.1 ENGINEERING CHANGE ORDERS (ECOs)

Any ECO resulting in a change to a part of the product described in an external agency's report requires an update to that report.

2.2 PURCHASE SPECIFICATION ECOs

An ECO to a primary power component, a component used in a safety circuit, or a component used for circuit protection usually requires an agency report update. Refer to the Product Safety Report for a listing of controlled components.

2.3 NEW PRODUCT SUBMITTALS

When a new product is similar in design to an existing product, the PSE shall process an agency report update to the existing agency report for that product.

2.4 MANUFACTURING LOCATION

All manufacturing sites applying an external agency's monogram shall be approved by the agency for the product being built. A plant, either Digital or a subcontractor, cannot apply an external agency's monogram to a product until the PPSC has received an updated report from the applicable agency designating that plant as an authorized manufacturer of the product. This applies to new products, the transfer of existing products, and the subcontracting of new or existing products.

2.5 MANUFACTURING PROCESS CHANGE

Most external agencies require that all primary power equipment undergo ground continuity and dielectric withstand tests. These tests shall be done in accordance with EL-MF277-00, *Electric Safety Product Test Procedure*. There are exceptions to this requirement; however, they shall be made via the agency submittal procedure. All models and manufacturers of hipot test equipment shall be approved by the agencies prior to its use in manufacturing. Some agencies (for example, UL) further require that the manufacturer and model number of the hipot tester be listed in the Section General of the product report.

2.6 NEW VENDOR COMPONENTS

Most primary power components, thermoplastic materials, and certain secondary circuit components used in Digital products are specified in the agency reports by vendor and vendor part number. Use of any other vendor for these parts shall be evaluated by the agency and requires an agency report update. Use of the alternate vendor's component is not allowed until the PPSC has received the updated report from the agency.

2.7 CLERICAL ERRORS

It is the responsibility of the submitter to ensure that all updated reports are correct and accurate.

2.8 NONCOMPLIANCE REPORT

Notification by the agency (TUV/CSA - *Findings Letter*, UL - *Variation Notice*) that the report submitted to the agency or construction of the product does not meet agency requirements.

3 AGENCY REPORT UPDATE PROCEDURE

An agency report update, per the requirements of Section 2 of this document, is required when adding a new product or a new model variation to an existing product.

3.1 ENGINEERING

Engineering shall complete the following when filing an agency report update.

1. Identify the support engineering group currently responsible for the product to coordinate the agency report updates.
2. Negotiate the change(s), any funding issues, time frames, and who will make the submittal.
3. Coordinate the agency report update by overseeing any testing to be performed and documenting the results.
4. Fill out the agency report update form and attach the applicable documentation.
5. Check the completed revision for accuracy and update the product file.

3.2 SUPPORT ENGINEERING

The support engineering group shall be aware of and coordinate all changes to the product file for which they are responsible.

3.3 MANUFACTURING

Manufacturing shall complete the following when filing an agency report update.

1. Identify and contact the support engineering group responsible for the product to coordinate the agency report update.
2. Negotiate the change(s), any funding issues, time frames, and who will make the submittal.
3. Provide the engineer with requested documentation or fill out the agency report update form and attach all requested documentation if you are the submitter.
4. Check the completed revision for accuracy.
5. Update product files.

NOTE

Manufacturing may elect, by geographical areas, a central organization to coordinate their submittals.

4 NONCOMPLIANCE REPORTS

Noncompliance reports (VNs from UL and findings letters from TUV and CSA) shall be addressed within the time frame specified by the agency, but in no case more than 30 days from receipt. Noncompliance reports take precedence over all other agency report updates.

The following steps shall be taken to resolve a noncompliance report.

1. Identify why the product is noncompliant.
2. Contact the responsible product safety group for support, if applicable.
3. Write a letter to the agency explaining the corrective action.
   - List steps necessary to correct the variation.
   - Include a copy of the noncompliance report.
   - Include an agency report update for corrective action, if required.
   - Include all applicable test information and documentation necessary to support corrective action.

5 CLERICAL CHANGES TO UL REPORTS

Clerical changes to UL reports must be brought to the attention of the UL Progress Department within 60 days of receipt of an update.

If clerical changes are sent to UL Engineering, they are processed as normal changes and Digital will be charged.

Refer to Figure 4 and Figure 5 for sample cover and correction letters.

Figure 1: Sample UL Agency Report Update Form

digital			
DIGITAL EQUIPMENT CORP. AGENCY REPORT UPDATE	Support Engineer: Date:		
Originator's Name:	UL Client Code	Phone:	Date:
Mailing address including mailstop:			
Equipment Identification:			
UL/CSA File Number:	Volume:	Section:	
TUV License Number:			
Page/Item no.	Change Description	Reason For Change	

Figure 2: Sample UL Variation Notice Response Letter

<Digital Logo>

<Date>

<UL Contact Name>
Follow–Up Services
Underwriters Laboratories, Inc.
1285 Walt Whitman Road
Melville, Long Island, NY 11747

Subject: Variation Notice Order No. <1>, Dated <2>

Reference: File No <3>, Vol <4>, Sec <5>, Issued <6>

Client Code Number: <7>

Dear <UL Contact Name>:

The following is our response to the subject Variation Notice.

(List each item with explanations, as required on the Variation Notice.)

Sincerely,

<Your Name>
<Your Department>

****

1. The Order Number is found in the upper right hand corner of the Variation Notice, on the fourth line down.

2. The date is the date the Variation Notice is issued, found just below the Order Number.

3. The File Number is found just below the Order Number.

4–6. Volume, Section, and Issue Date are usually referenced on the first line of the text of the Variation Notice.

7. The client code number is the unique number that has been assigned by UL to each manufacturing plant and engineering group for billing purposes.

Figure 3: Sample TUV Agency Report Update Form

<Digital Logo>

<Date>
<For name and address refer to TUV License>

Subject: Construction Change to <Digital product model number>

TUV Project number: <obtained from TUV>
TUV License number: <Product License number>
TUV Component License number: <obtained from vendor>

Dear <TUV Contact Name>:

The following construction changes have been made to the referenced product.

(List each item with explanations)

Sincerely,

<your name>
<your title/department>

CC: File

* NOTE: This signature must be either the Design Engineer or the Product Safety Engineer.

Figure 4: Sample Change Request Cover Letter

<Digital Logo>

<UL Contact Name>
Underwriter's Laboratories, Inc.
1285 Walt Whitman Road
Melville, Long Island, NY 11747

Subject: Revision of UL Follow–Up Procedure <Digital product model number>

Reference: File No. Client No.
Vol. Sec. Issued

Dear <UL Contact Name>:

Please revise the referenced Follow–Up Procedure in accordance with the attached, marked–up pages. These changes involve pages <page numbers> of the product report.

Specific comments, if required, will be noted on the individual pages by the Product Safety Engineer.

If you have any questions concerning this change, please do not hesitate to contact me.

Sincerely,

<your name>
<your department>
<your telephone number>

CC: File

Figure 5: Sample Change Report Correction Letter

<Digital Logo>

<UL Contact Name>
Progress Department
Underwriter's Laboratories, Inc.
1285 Walt Whitman Road
Melville, Long Island, NY 11747

Subject: Correction of Follow–Up Service Procedure

Reference: UL Project Number/PD Number:

File No. Vol. Sec. Issued:

Client Number:

Dear Ms. McGowan:

We have discovered inaccuracies with the referenced UL Project.

These inaccuracies are found on pages <note pages> of the procedure.

Please reference the attached marked–up pages of the procedure for the corrections.

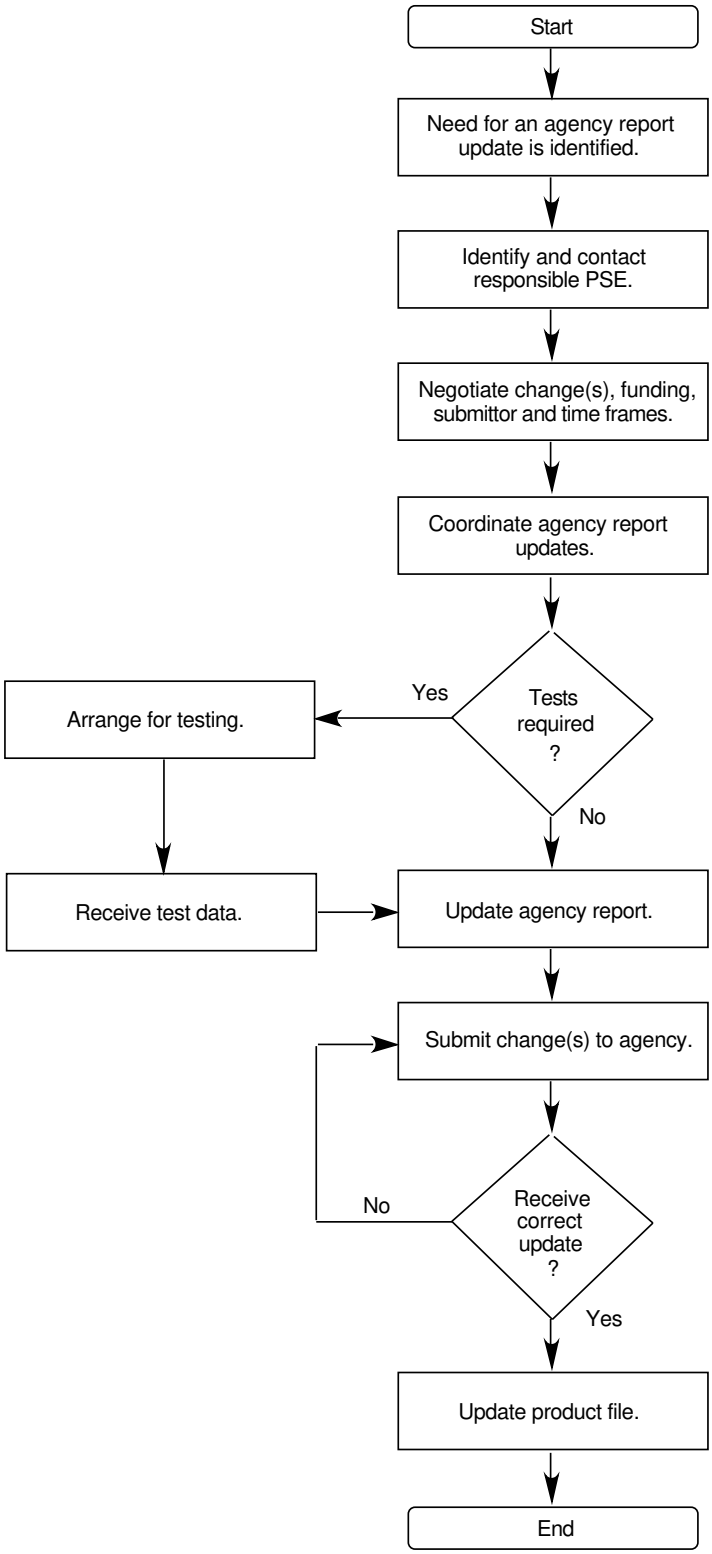
If you have any questions concerning this change, please do not hesitate to contact me.

Sincerely,

<your name>
<your department>
<your telephone number>

CC: File

Figure 6: Agency Report Update Procedure



APPENDIX A REFERENCED DOCUMENTS

A.1 EL-Class Digital Documents

EL-Class Number	Document Title
EL-00119-05	*DEC STD 119-5 Process for Design, Evaluation, Testing, and Certification of Hardware Products to Product Safety Requirements*
EL-00424-00	*Digital Product Safety Handbook*
EL-MF277-00	*Electrical Safety Product Test Procedure*

Use VTX SMC to order copies of EL-class documents from Standards and Methods Control. Send distribution questions to JOKUR::SMC or call DTN: 234-4423.

A.2 Other Documents

Document Number	Document Title
	UL Follow-Up Services Procedure
	CSA Model Certification Report

A.3 Ordering Information

Following are the sources for documents not available from Standards and Methods Control.

- Copies of the *UL Follow-Up Services Procedure* are available from Underwriters Laboratories, Inc., 1285 Walt Whitman Road, Melville, Long Island, NY 11747.
- Copies of the *CSA Model Certification Report* are available from Canadian Standards Association, 178 Rexdale Boulevard, Rexdale Ontario, Canada M9W1R3.

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+-------------------------------------------------------------------+
|                        READER COMMENTS                            |
|                                                                   |
| Your  comments  and suggestions  will help  Standards and Methods |
| Control improve their services and documents.                     |
+-------------------------------------------------------------------+
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What are your impressions of this document? Consider format, organization, completeness, readability, and illustrations.

————————————**FOLD ON THIS LINE**———————————————————————— -

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Are the instructions for the update package clear? _____
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